

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

**SHADOW GLEN 2021, LLC**

*Plaintiff,*

v.

**STEWARD HEALTH CARE SYSTEM, LLC,  
d/b/a GLENWOOD REGIONAL MEDICAL  
CENTER and MPT OF WEST MONROE,  
LLC**

*Defendants.*

**Case No. 3:22-cv-05163**

**JOINT MOTION FOR EXTENSION OF TIME**

Plaintiff Shadow Glen 2021, LLC (“Plaintiff”) and Defendant, Steward Health Care System LLC, (“Defendant”) (herein collectively referred to as the “Parties”) respectfully submit the following Motion for Extension of Time related to this Court’s ruling following a status conference held before Magistrate Judge Kayla D. McClusky on July 27, 2023 and respectfully states as follows:

1. The Court held the status conference at issue to discuss the pending Amended Motion to Compel [doc. #40] and underlying jurisdictional issues involved in the above captioned matter.
2. Defendant filed a Response [doc. #42], in which it contends that it is not the proper Defendant in this matter and, thus, should not be compelled to provide confidential and proprietary information.

3. After discussion, Magistrate Judge Kayla D. McClusky set a deadline of August 11, 2023, for the parties to confer and to attempt to resolve the remaining issues as to the proper defendant. Further, the Court stated that no later than August 11, 2023, Plaintiffs are granted leave to file a Third Amended Complaint, and the parties are further granted leave to file any other appropriate motion or memorandum to assist the Court in resolving the remaining jurisdictional issues.

4. In furtherance of Judge McClusky's directive, the Parties have exchanged multiple documents, as well as proposed stipulations, in an effort to resolve the issue as to the proper defendant.

5. However, the Parties need additional time to conduct due diligence surrounding this issue and thus respectfully request that the Court extend the time for the Parties to resolve this issue by fourteen (14) days through and including August 25, 2023.

6. This request for an extension of time is not made for delay but so that the ends of justice may be served.

WHEREFORE, the Parties respectfully request that the Court enter an order substantially in the form attached hereto granting the Parties an extension of time until August 25, 2023 to resolve the issues addressed by this Court during the July 27, 2023 status conference in this matter, and for such additional and further relief as the Court deems just and proper.

**DATED:** August 11, 2023.

Respectfully Submitted,

/s/ Peyton C. Lambert

**Peyton C. Lambert**

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**ATTORNEYS FOR PLAINTIFF SHADOW  
GLEN 2021, LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 11, 2023, true and correct copies of the foregoing were forwarded to all parties via the Court's ECF system.

*/s/ Peyton C. Lambert*

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Peyton C. Lambert